



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

February 5, 2018

Tami Jones-Jefferson
U.S. Federal and State Regulatory Manager
Dow AgroSciences, LLC
9330 Zionsville Road, 308/2E
Indianapolis, IN 46268-1054

Subject: Label Amendment – Remove grazing restriction and other changes
Supplemental Label – Directions for Use on Land Grazed by Lactating Dairy Animals
Product Name: GF-1529
EPA Registration Number: 62719-527
Application Date: August 17, 2017
Decision Number: 533024

Dear Ms. Jones-Jefferson:

The amended label and supplemental label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, are acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

Stamped copies of the labels are enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

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Decision No. 533024

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, please contact Mindy Ondish by phone at 703-605-0723, or via email at ondish.mindy@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Reuben Baris". The signature is stylized and written in a cursive-like font.

Reuben Baris, Product Manager 25
Herbicide Branch
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

(Base label):

TRICLOPYR	GROUP	4	HERBICIDE
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GF-1529

SPECIALTY HERBICIDE

For the control of woody plants and vines, and annual and perennial broadleaf weeds on

- Conservation Reserve Program (CRP), rangeland and permanent grass pastures
- forest sites,
- non cropland areas including: electrical power and utility rights-of-way, industrial sites, non-irrigation ditch banks, pipelines, railroads, roadsides; and
- natural areas and wildlife habitat and management areas;
- including grazed areas on all of these listed sites.

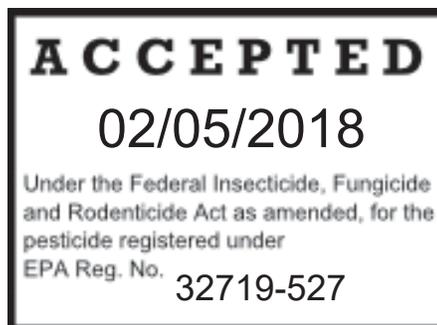
Active Ingredient:

triclopyr: 2-[(3,5,6-trichloro-2-pyridinyl)oxy]	
acetic acid, butoxyethyl ester	60.45%
Other Ingredients.....	39.55%
Total	100.00%

Acid equivalent: triclopyr – 43.46% - 4 lb/gal

Keep Out of Reach of Children

CAUTION



Precautionary Statements

Hazards to Humans and Domestic Animals

CAUTION

Causes Moderate Eye Irritation • Harmful If Swallowed • Prolonged Or Frequently Repeated Skin Contact May Cause Allergic Reactions In Some Individuals

Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.

Personal Protective Equipment (PPE)

Applicators and other handlers who handle this pesticide must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of barrier laminate, nitrile rubber ≥14 mils, neoprene rubber ≥14 mils, or viton ≥14 mils
- Shoes plus socks

Follow the manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

Engineering Controls

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR 170.240(d)(4-6)), the handler PPE requirements may be reduced or modified as specified in the WPS.

User Safety Recommendations

Users should:

- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

First Aid

If on skin or clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

If swallowed: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-992-5994 for emergency medical treatment information.

Environmental Hazards

This pesticide is toxic to fish. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment washwaters.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. Refer to label booklet under "Agricultural Use Requirements" in the Directions for Use section for information about this standard.

(Storage and Disposal for rigid containers 5 gal or less)

Storage and Disposal

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Store above 28°F or agitate before use.

Pesticide Disposal: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility. Open dumping is prohibited.

Container Handling: Nonrefillable container. Do not reuse or refill this container.

Triple rinse or pressure rinse container (or equivalent) promptly after emptying. **Triple rinse** as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds

after the flow begins to drip. Repeat this procedure two more times. **Pressure rinse** as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

(Storage and Disposal for refillable rigid containers larger than 5 gal)

Storage and Disposal

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Store above 28°F or agitate before use.

Pesticide Disposal: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility. Open dumping is prohibited.

Container Handling: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose.

Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10% full with water and, if possible, spray all sides while adding water. If practical, agitate vigorously or recirculate water with the pump for two minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

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Refer to inside of label booklet for additional precautionary information including directions for use.

Notice: Read the entire label. Use only according to label directions. **Before using this product, read Warranty Disclaimer Inherent Risks of Use, and Limitation of Remedies at end of label booklet. If terms are unacceptable, return at once unopened.**

In case of emergency endangering health or the environment involving this product, call 1-800-992-5994.

Agricultural Chemical: Do not ship or store with food, feeds, drugs or clothing.

EPA Reg. No. 62719-527

EPA Est. _____

®Trademark of The Dow Chemical Company ("Dow") or an affiliated company of Dow

Produced for
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268

NET CONTENTS _____

(Label booklet cover):

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GF-1529

SPECIALTY HERBICIDE

For the control of woody plants and vines, and annual and perennial broadleaf weeds on

- Conservation Reserve Program (CRP), rangeland and permanent grass pastures
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- natural areas and wildlife habitat and management areas;
- including grazed areas on all of these listed sites.

Active Ingredient:

triclopyr: 2-[(3,5,6-trichloro-2-pyridinyl)oxy] acetic acid, butoxyethyl ester	60.45%
Other Ingredients.....	39.55%
Total	100.00%

Acid equivalent: triclopyr – 43.46% - 4 lb/gal

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NET CONTENTS ____

(Page 1 through end):

Precautionary Statements

Hazards to Humans and Domestic Animals

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Personal Protective Equipment (PPE)

Applicators and other handlers who handle this pesticide must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of barrier laminate, nitrile rubber ≥ 14 mils, neoprene rubber ≥ 14 mils, or viton ≥ 14 mils
- Shoes plus socks

Follow the manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

Engineering Controls

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR 170.240(d)(4-6)), the handler PPE requirements may be reduced or modified as specified in the WPS.

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Users should:

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Environmental Hazards

This pesticide is toxic to fish. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment washwaters.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read all Directions for Use carefully before applying.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the agency responsible for pesticide regulation.

Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls
- Chemical-resistant gloves made of barrier laminate, nitrile rubber ≥ 14 mils, neoprene rubber ≥ 14 mils, or viton ≥ 14 mils
- Shoes plus socks

Non-Agricultural Use Requirements

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for Agricultural Pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

Entry Restrictions for Non-WPS Uses: Do not enter or allow others to enter the treated area until sprays have dried.

Storage and Disposal

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Store above 28°F or agitate before use.

Pesticide Disposal: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility. Open dumping is prohibited.

Nonrefillable containers 5 gallons or less:

Container Handling: Nonrefillable container. Do not reuse or refill this container.

Triple rinse or pressure rinse container (or equivalent) promptly after emptying. **Triple rinse** as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. **Pressure rinse** as follows: Empty

the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

Refillable containers 5 gallons or larger:

Container Handling: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose.

Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10% full with water and, if possible, spray all sides while adding water. If practical, agitate vigorously or recirculate water with the pump for two minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

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Product Information

GF-1529 specialty herbicide is recommended for the control of woody plants and vines, and herbaceous broadleaf weeds on Conservation Reserve Programs (CRP), rangeland and permanent grass pastures, forest sites, conifer plantations, non-cropland areas, including airports, barrow ditches, communication transmission lines, electrical power and utility rights-of-way, fencerows, gravel pits, industrial sites, military lands, mining and drilling areas, non-irrigation ditch banks, oil and gas pads, parking lots, petroleum tank farms, pipelines, railroads, roadsides, storage areas, storm water retention areas, substations, unimproved rough turf grasses, vacant lots and other non-crop residential areas; and natural areas (open space) for example campgrounds, parks, prairie management, trails and trialheads, recreation areas, wildlife openings, and wildlife habitat and management areas including grazed area on all these listed sites.

Use Precautions

When applying this product in tank mix combination, follow all applicable use directions and precautions on each manufacturer's label. It is the pesticide user's responsibility to ensure that all products in the listed mixtures are registered for the intended use. Users must follow the most restrictive directions for use and precautionary statements of each product in the tank mixture.

Sprays applied directly to Christmas trees may result in conifer injury. When treating unwanted vegetation in Christmas tree plantations, care should be taken to direct sprays away from conifers.

GF-1529 is formulated as a low volatile ester. However, the combination of spray contact with impervious surfaces, such as roads and rocks, and increasing ambient air temperatures, may result in an increase in the volatility potential for this herbicide, increasing a risk for off-target injury to sensitive crops such as grapes and tomatoes.

Use Restrictions

Chemigation: Do not apply this product through any type of irrigation system.

Do not apply GF-1529 directly to, or otherwise permit it to come into direct contact with cotton, grapes, peanuts, soybeans, tobacco, vegetable crops, flowers, citrus, or other desirable broadleaf plants. Do not permit spray mists containing it to drift onto such plants.

It is permissible to treat non-irrigation ditch banks, seasonally dry wetlands (such as flood plains, deltas, marshes, swamps, or bogs) and transitional areas between upland and lowland sites where surface water is not present except in isolated pockets due to uneven or unlevel conditions. Do not apply to open water (such as lakes, reservoirs, rivers, streams, creeks, salt water bays, or estuaries).

Do not apply on ditches that are used to transport irrigation water. Do not apply where runoff or irrigation water may flow onto agricultural land as injury to crops may result.

Do not apply this product using mist blowers.

Maximum Use Rates

- Apply no more than 2 lb ae of triclopyr (2 quarts of GF-1529) per acre per growing season on range and pasture sites, or any area where grazing or harvesting hay is allowed.
- On forestry sites, apply no more than 6 lb ae of triclopyr (6 quarts of GF-1529) per acre per year.
- For all use sites other than range, pasture, forestry sites, and grazed /hayed areas, apply no more than 8 lb ae triclopyr (8 quarts of GF-1529) per acre per year.
- See Table 1 below for relationship between mixing rate, spray volume, and maximum application rate.

Grazing

- There are no grazing restrictions for livestock or dairy animals on treated areas
- Portions of grazed areas that intersect treated non-cropland and rights-of-way sites may be treated at up to 8 lb ae per acre if the area to be treated on the day of application comprises no more than 10% of the total grazable area.

Haying (harvesting of dried forage)

- Do not harvest hay for 14 days after application.

Slaughter Restriction: During the season of application, withdraw livestock from grazing treated grass at least 3 days before slaughter.

Avoid Injurious Spray Drift

Make applications only when there is little or no hazard from spray drift. Small quantities of spray, which may not be visible, may seriously injure susceptible plants. Do not spray when wind is blowing toward susceptible crops or ornamental plants that are near enough to be injured. It is suggested that a continuous smoke column at or near the spray site or a smoke generator on the spray equipment be used to detect air movement, lapse conditions, or temperature inversions (stable air). If the smoke layers or indicates a potential of hazardous spray drift, do not spray.

Aerial Application (Helicopter Only unless for CRP, rangeland and pasture applications where fixed wing can be used): For aerial application on rights-of-way or other areas near susceptible crops, apply through a Microfoil¹ or Thru-Valve¹ boom, or other drift control application equipment and/or use an agriculturally labeled drift control additive. If a spray thickening agent is used, follow all use recommendations and precautions on the product label. Spray only when the wind velocity is low (follow state regulations). Avoid application during air inversions.

¹ Reference within this label to a particular piece of equipment produced by or available from other parties is provided without consideration for use by the reader at its discretion and subject to the reader's independent circumstances, evaluation, and expertise. Such reference by Dow AgroSciences is not intended as an endorsement of such equipment, shall not constitute a warranty (express or implied) of such equipment, and is not intended to imply that other equipment is not available and equally suitable. Any discussion of methods of use of such equipment does not imply that the reader should use the equipment other than is advised in directions available from the equipment's manufacturer. The reader is responsible for exercising its own judgment and expertise, or consulting with sources other than Dow AgroSciences, in selecting and determining how to use its equipment.

Spray Drift Management

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment and weather related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions.

The following drift management requirements must be followed to avoid off-target drift movement from aerial applications:

- The distance of the outer most operating nozzles on the boom must not exceed 3/4 the length of the rotor.
- Nozzles must always point backward parallel with the air stream and never be pointed downwards more than 45 degrees.

Where states have more stringent regulations, they must be observed.

The applicator should be familiar with and take into account the information covered in the following Aerial Drift Reduction Advisory. [This information is advisory in nature and does not supersede mandatory label requirements.]

Aerial Drift Reduction Advisory

Information on Droplet Size: The most effective way to reduce drift potential is to apply large droplets. The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. Applying larger droplets reduces drift potential, but will not prevent drift if applications are made improperly, or under unfavorable environmental conditions (see Wind, Temperature and Humidity, and Temperature Inversions).

Controlling Droplet Size:

- **Volume** - Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.
- **Pressure** - Do not exceed the nozzle manufacturer's recommended pressures. For many nozzle types lower pressure produces larger droplets. When higher flow rates are needed, use higher flow rate nozzles instead of increasing pressure.
- **Number of Nozzles** - Use the minimum number of nozzles that provide uniform coverage.
- **Nozzle Orientation** - Orienting nozzles so that the spray is released parallel to the airstream produces larger droplets than other orientations and is the recommended practice. Significant deflection from horizontal will reduce droplet size and increase drift potential.
- **Nozzle Type** - Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low-drift nozzles. Solid stream nozzles oriented straight back produce the largest droplets and the lowest drift.

Boom Length: For some use patterns, reducing the effective boom length to less than 3/4 of the wingspan or rotor length may further reduce drift without reducing swath width.

Application Height: Applications should not be made at a height greater than 10 feet above the top of the largest plants unless a greater height is required for aircraft safety. Making applications at the lowest height that is safe reduces exposure of droplets to evaporation and wind.

Swath Adjustment: When applications are made with a crosswind, the swath will be displaced downwind. Therefore, on the up and downwind edges of the field, the applicator must compensate for this displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase, with increasing drift potential (higher wind, smaller drops, etc.).

Wind: Drift potential is lowest between wind speeds of 2 to 10 mph. However, many factors, including droplet size and equipment type, determine drift potential at any given speed. Application should be avoided below 2 mph due to variable wind direction and high inversion potential. **Note:** Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift.

Temperature and Humidity: When making applications in low relative humidity, set up equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is most severe when conditions are both hot and dry.

Temperature Inversions: Applications should not occur during a local, low level temperature inversion because drift potential is high. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperatures with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of the smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.

Sensitive Areas: The pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g., residential areas, bodies of water, known habitat for threatened or endangered species, non-target crops) is minimal (e.g., when wind is blowing away from the sensitive areas).

Ground Equipment: To aid in reducing spray drift potential when making ground applications near susceptible crops or other desirable broadleaf plants, GF-1529 should be used in thickened (high viscosity) spray mixtures using an agriculturally labeled drift control additive, high viscosity invert system, or equivalent as directed by the manufacturer. When using a spray thickening or inverting additive, follow all use directions and precautions on the product label. With ground equipment, spray drift can be reduced by keeping the spray boom as low as possible; by applying 20 gallons or more of spray per acre; by keeping the operating spray pressures at the lower end of the manufacturer's recommended pressures for the specific nozzle type used (low pressure nozzles are available from spray equipment manufacturers); and by spraying when wind velocity is low. Do not apply with nozzles that produce a fine droplet spray. Select nozzles and pressures which provide adequate plant coverage, but minimize the production of fine spray particles.

High Volume Leaf-Stem Treatment: To minimize spray drift, keep sprays no higher than brush tops and keep spray pressures low enough to provide coarse spray droplets. A agriculturally labeled thickening agent may be used to reduce spray drift.

Mixing Directions for all use sites

GF-1529 may be foliarly applied by diluting with water or by preparing an oil-water emulsion. For woody plant control, an oil-water emulsion performs more dependably under a broader range of conditions than a straight water dilution and is recommended for aerial applications.

Oil-Water Mixture Sprays

Prepare a premix of oil, surfactant and GF-1529 in a separate container using diesel fuel, fuel oil, or kerosene plus an emulsifier such as Sponto 712 or Triton X-100. Use a jar test to check spray mix compatibility before preparing oil-water emulsion sprays in the mixing tank. Do not allow any water or mixtures containing water to get into the premix or GF-1529 since a thick "invert" (water in oil) emulsion may form that will be difficult to break. Such an emulsion may also be formed if the premix of GF-1529 is put into the mixing tank before the addition of water. Fill the spray tank about one-half full with water, then slowly add the premix with continuous agitation and complete filling the tank with water. Continue moderate agitation.

Oil Mixture Sprays for Basal Treatment

Prepare oil-based spray mixtures using either a commercially available basal oil, kerosene diesel fuel, or No. 1 or No. 2 fuel oil. Substitute other oils or diluents only as recommended by the oil or diluent's manufacturer. When mixing an oil mixture, read and follow the use directions and precautions on the manufacturer's product label. Add GF-1529 to the required amount of oil in the spray tank or mixing tank and mix thoroughly. If the mixture stands over four hours, reagitation is required.

Oil Mixtures of GF-1529 and Tordon 22K: Tordon 22K and GF-1529 may be used in tank mix combination for basal bark treatment of woody plants. These herbicides are incompatible and will not form a stable mixture when mixed together directly in oil. Make a stable tank mixture for basal bark application by first combining each product with a compatibility agent prior to final mixing in the desired ratio. Tordon 22K is not registered for use in the states of California and Florida.

Herbicide Resistance Management:

Triclopyr, the active ingredient in this product, is a Group 4 herbicide based on the mode of action classification system of the Weed Science Society of America.

Any weed population may contain or develop plants resistant to Group 4 herbicides. Resistant weeds may dominate the weed population if these herbicides are used repeatedly in the same field. Such resistant weed plants may not be effectively managed using Group 4 herbicides but may be effectively managed utilizing other herbicides alone or in mixtures from a different herbicide Groups that are labeled for control of these weeds and/or by using cultural or mechanical practices. However, a herbicide mode of action classification by itself may not adequately address specific weeds that are resistant to specific herbicides.

Rotate the use of GF-1529 or other Group 4 herbicides within a growing season sequence or among growing seasons with different herbicide groups that control the same weeds in a field.

Use tank mixtures with herbicides from a different group if such use is permitted; where information on resistance in target weed species is available, use less the resistance-prone partner at a rate that will control the target weed(s) equally as well as the more resistance-prone partner. Consult your local extension service or certified crop advisor if you are unsure as to which active ingredient is less prone to resistance.

Adopt an integrated weed management program for herbicide use that includes scouting and uses historical information related to herbicide use and crop rotation that considers tillage (or other mechanical control methods), cultural, biological, and other management practices.

Scout after a herbicide application to monitor weed populations for early signs of resistance development. Indicators of possible herbicide resistance include: (1) failure to control a weed species normally controlled by the herbicide at the dose applied, especially if control is achieved on adjacent weeds; (2) a spreading patch of non-controlled plants of a particular weed species; (3) surviving plants mixed with controlled individuals of the same species. If resistance is suspected, prevent weed seed production in the affected area by an alternative herbicide from a different group or by mechanical method such as hoeing, mowing or tillage. Prevent movement of resistant weed seeds to other fields by cleaning harvesting and tillage equipment when moving between fields, and planting clean seed.

If a weed population continues to progress after treatment with this product, discontinue use of this product, and switch to another management strategy or herbicide with a different mode of action, if available.

Contact your local extension specialist or certified crop advisor for additional pesticide resistance management or integrated weed management recommendations for specific use sites.

Plants Controlled by GF-1529

Woody Plants Controlled

Common Name	Scientific Name	Life Cycle	Plant Family
acacia, twisted	<i>Acacia tortuosa</i>	perennial	Fabaceae
alder	<i>Aldus spp.</i>	perennial	Betulaceae
arrowwood	<i>Viburnum ventanum</i>	perennial	Caprifoliaceae
ash	<i>Fraxinus spp.</i>	perennial	Oleaceae
aspen	<i>Populus tremuloides</i>	perennial	Salicaceae
bear clover (bearmat)	<i>Chamaebatia foliolosa</i>	perennial	Fabaceae
beech	<i>Fagus spp.</i>	perennial	Fagaceae
birch	<i>Betula spp.</i>	perennial	Betulaceae
blackberry	<i>Rubus spp.</i>	perennial	Rosaceae
blackbrush	<i>Acacia rigidula</i>	perennial	Fabaceae
blackgum	<i>Nyssa salvatica</i>	perennial	Cornaceae
boxelder (1)	<i>Acer negundo</i>	perennial	Aceraceae
Brazilian pepper	<i>Schinus terebinthifolius</i>	perennial	Anacardiaceae
buckthorn	<i>Rhamnus spp.</i>	perennial	Rhamnaceae
cascara	<i>Rhamnus pushiana</i>	perennial	Rhamnaceae
ceanothus	<i>Ceanothus spp.</i>	perennial	Rhamnaceae
cherry	<i>Prunus spp.</i>	perennial	Rosaceae
cherry, choke	<i>Prunus virginiana</i>	perennial	Rosaceae
chinquapin	<i>Quercus muhlenbergii</i>	perennial	Fagaceae
cottonwood	<i>Populus deltoides</i>	perennial	Salicaceae
crataegus (hawthorn)	<i>Crataegus spp.</i>	perennial	Rosaceae
creeper, virginia (1)	<i>Parthenocissus quinquefolia</i>	perennial	Vitaceae
dogwood	<i>Cornus spp.</i>	perennial	Cornaceae
douglas-fir	<i>Psuedotsuga menziesii</i>	perennial	Pinaceae
elderberry	<i>Sambucus Canadensis</i>	perennial	Caprifoliaceae
elm	<i>Ulmus, spp</i>	perennial	Ulmaceae
elm, winged	<i>Ulmus alata</i>	perennial	Ulmaceae
gallberry	<i>Ilex coriacea</i>	perennial	Aquifoliaceae
granjeno	<i>Celtis ehrenbergiana</i>	perennial	Ulmaceae
guajillo	<i>Acacia berlandieri</i>	perennial	Fabaceae

guava	<i>Psidium guajava</i>	perennial	Myrtaceae
gorse	<i>Ulex europaeus</i>	perennial	Fabaceae
hazel	<i>Corylus americana</i>	perennial	Betulaceae
hickory	<i>Carya spp.</i>	perennial	Juglandaceae
hornbeam	<i>Carpinus spp.</i>	perennial	Betulaceae
huisache (suppression)	<i>Acacia farnesiana</i>	perennial	Fabaceae
ivy, poison	<i>Toxicodendron radicans</i>	perennial	Anacardiaceae
kudzu	<i>Pueraria lobata</i>	perennial	Fabaceae
locust	<i>Robinia spp.</i>	perennial	Fabaceae
madrone	<i>Arbutus spp.</i>	perennial	Ericaceae
magnolia, sweetbay	<i>Magnolia virginiana</i>	perennial	Magnoliaceae
maples	<i>Acer spp.</i>	perennial	Aceraceae
maple, bigleaf (1)	<i>Acer macrophyllum</i>	perennial	Aceraceae
milkweed vine (1)	<i>Asclepias spp.</i>	perennial	Asclepiaceae
mulberry	<i>Morus spp.</i>	perennial	Moraceae
myrtle, wax	<i>Morella cerifera</i>	perennial	Myricaceae
oaks	<i>Quercus spp.</i>	perennial	Fagaceae
oak, poison	<i>Toxicodendron diversilobum</i>	perennial	Anacardiaceae
osage orange	<i>Maclura pomifera</i>	perennial	Moraceae
peppervine	<i>Ampelopsis arborea</i>	perennial	Vitaceae
persimmon	<i>Disospyros spp.</i>	perennial	Ebenaceae
pine	<i>Pinus spp.</i>	perennial	Pinaceae
poplar	<i>Populus spp.</i>	perennial	Salicaceae
poplar, tulip	<i>Liriodendron tulipifera</i>	perennial	Magnoliaceae
primrose, willow	<i>Ludwigia peruviana</i>	perennial	Onagraceae
rose, wild	<i>Rosa spp.</i>	perennial	Rosaceae
salmonberry	<i>Rubus spectabilis</i>	perennial	Rosaceae
saltbush (silver myrtle)	<i>Baccharis spp</i>	perennial	Asteraceae
saltcedar	<i>Tamarix spp.</i>	perennial	Tamariaceae
sassafrass	<i>Sassafras spp.</i>	perennial	Lauraceae
scotchbroom	<i>Cytisus scoparius</i>	perennial	Fabaceae
sumac	<i>Rhus spp.</i>	perennial	Anacardiaceae
sweetgum	<i>Liquidamber styraciflura</i>	perennial	Hamamelidaceae
sycamore	<i>Platanus occidentalis</i>	perennial	Plantanaceae
tanoak	<i>Notholithocarpus densiflorus</i>	perennial	Fagaceae
tree of heaven	<i>Ailanthus altissima</i>	perennial	Simaroubaceae
trumpet creeper (1)	<i>Campsis radicans</i>	perennial	Bignoniaceae
willow	<i>Salix spp.</i>	perennial	Saliciaceae

¹For best control, use either a basal bark or cut stump treatment.

²For complete control, re-treatment may be necessary.

Annual and Perennial Broadleaf Weeds

Common Name	Scientific Name	Life Cycle	Plant Family
beggarweed, creeping	<i>Desmodium incanum</i>	perennial	Fabaceae
bindweed, field (top growth)	<i>Convolvulus arvensis</i>	perennial	Convolvulaceae
burdock, common	<i>Arctium minus</i>	biennial	Asteraceae
carrot, wild	<i>Daucus carota</i>	biennial	Apiaceae
chicory	<i>Cichorium intybus</i>	perennial	Asteraceae
cinquefoil, sulfur (2)	<i>Potentilla recta</i>	perennial	Rosaceae
clover	<i>Trifolium spp.</i>	perennial	Fabaceae
dandelion (top growth)	<i>Taraxacum officinale</i>	perennial	Asteraceae
dock, curly	<i>Rumex crispus</i>	perennial	Polygonaceae
dogfennel	<i>Eupatorium capillifolium</i>	perennial	Asteraceae
goldenrod	<i>Solidago spp.</i>	perennial	Asteraceae
ivy, ground	<i>Glechoma hederacea</i>	perennial	Lamiaceae
kudzu	<i>Pueraria montana</i>	perennial	Fabaceae
lambsquarters	<i>Chenopodium spp.</i>	annual	Chenopodiaceae
lespedeza, annual	<i>Lespedeza striata</i>	annual	Fabaceae
lespedeza, Sericea (1)	<i>Lespedeza cuneata</i>	perennial	Fabaceae
lettuce, prickly	<i>Lactuca serriola</i>	annual	Asteraceae
loosestrife, purple	<i>Lythrum salicaria</i>	perennial	Lythraceae
matchweed	<i>Lippia nodiflora</i>	perennial	Verbanaceae
medic, black	<i>Medicago lupulina</i>	perennial	Fabaceae
mustard	<i>Brassica spp.</i>	annual	Brassicaceae
muistard, garlic (4)	<i>Alliaria petiolata</i>	biennial	Brassicaceae
plantain	<i>Plantago spp.</i>	annual	Plantaginaceae
ragweed, common	<i>Ambrosia artemisiifolia</i>	annual	Asteraceae
ragweed, western	<i>Ambrosia psilostachya</i>	perennial	Asteraceae
smartweed, Pennsylvania	<i>Polygonum pennsylvanicum</i>	annual	Polygonaceae
soda apple, tropical (3)	<i>Solanum viarum</i>	perennial	Solanaceae
thistle, bull	<i>Cirsium vulgare</i>	biennial	Asteraceae
thistle, Canada	<i>Cirsium arvense</i>	perennial	Asteraceae
vetch	<i>Vicia spp.</i>	perennial	Fabaceae
violet, wild	<i>Viola papilionacea</i>	perennial	Violaceae
yarrow, common	<i>Achillea millefolium</i>	perennial	Asteraceae

1. **Sericea lespedeza:** Apply 1 to 2 pints of GF-1529 per acre. For best results, apply after maximum foliage development in the late spring to early summer, but prior to bloom.
2. **Sulfur cinquefoil:** Apply 1 to 2 pints of GF-1529 per acre. For best results, apply to plants in the rosette stage.
3. **Tropical soda apple:** Apply 2 pints of GF-1529 per acre when tropical soda apple plants reach the first flower stage. For best results, apply in a total spray volume of 40 gallons per acre using ground equipment. An agricultural surfactant may be added at the manufacturer's recommended rate to provide more complete wetting and coverage of the foliage. Spot treatments may be used to control sparse plant stands. For spot treatment use a 1 to 1.5% solution of GF-1529 in water (1 to 1 1/2 gallons of GF-1529 in 100 gallons total spray mixture) and spray the entire plant to completely wet the foliage. **In Florida**, control of tropical soda apple may be improved by using the following management practices:
 - Mow plants to a height of 3 inches every 50 to 60 days or whenever they reach flowering. Continue the mowing operation through April.
 - In late May to June (50 to 60 days after the April mowing), apply GF-1529 as a broadcast treatment.

- Use spot treatment to control any remaining plants or thin stands of plants that germinate following a broadcast treatment
4. **Garlic mustard:** apply as a 1.25 to 2.5% v/v foliar spray-to-wet application

Use Information

Use GF-1529 at rates of 1 to 8 quarts per acre to control broadleaf weeds and woody plants. It is suggested that rates higher in this rate range be used to control woody plants. In all cases, use the amount specified in enough water to give uniform and complete coverage of the plants to be controlled. The order of addition to the spray tank is water, spray thickening agent (if used), surfactant (if used), additional herbicide (if used), and GF-1529. If a standard agricultural surfactant is used, use at a rate of 1 to 2 quarts per acre. Use continuous adequate agitation.

Before using any recommended tank mixtures, read the directions and all precautions on both labels.

For best results apply when woody plants and weeds are actively growing. When hard to control species such as ash, blackgum, choke cherry, elm, maples (other than vine or big leaf), oaks, pines, or winged elm are prevalent, during applications made during late summer when the plants are mature, or during drought conditions, use the higher rates of GF-1529 alone or in combination with Graslan L or Tordon 22K herbicide. Graslan L and Tordon 22K are restricted use pesticides. Graslan L and Tordon 22K are not registered for use in the states of California and Florida.

When using GF-1529 in combination with Freelexx or a 2,4-D low volatile ester herbicide, generally the higher rates of GF-1529 should be used for satisfactory brush control.

Use the higher dosage rates when brush approaches an average of 15 feet in height or when the brush covers more than 60% of the area to be treated. If lower rates are used on hard to control species, resprouting may occur the year following treatment.

On sites where easy to control brush species dominate, rates less than those listed may be effective. Consult state or local extension personnel for such information.

Foliage Treatment With Ground Equipment

High Volume Foliage Treatment

For control of woody plants, use GF-1529 at the rate of 2 to 6 quarts per 100 gallons of spray mixture, or GF-1529 at 2 to 4 quarts may be tank mixed with labeled rates of Freelexx or a 2,4-D low volatile ester herbicide, Graslan L, or Tordon 22K and diluted to make 100 gallons of spray. Do not apply more than 2 gallons of GF-1529 per acre. Apply at a volume of 100 to 400 gallons of total spray per acre depending upon size and density of woody plants. Graslan L and Tordon 22K are not registered for use in the states of California and Florida. When tank mixing, follow applicable use directions and precautions on each manufacturer's label.

Depending upon the size and density of the woody plants, apply sufficient spray volume to thoroughly wet all leaves, stems, and root collars. To minimize spray drift, select the minimum spray pressure that provides adequate plant coverage without forming a mist and direct sprays no higher than the top of the target plants. Use a drift control additive cleared for application to growing crops to reduce spray drift. Before using any tank mixture, read the directions and use precautions on both labels. For best results, apply when woody plants and weeds are actively growing.

Table 1: The following table is provided as a guide to the user to achieve the proper rate of GF-1529 on forestry and non cropland sites

Total Spray Volume (gallons/acre)	Rate of GF-1529	
	Forestry Sites (qt/100 gallons of spray) ¹	Non-Cropland Sites (qt/100 gallons of spray) ²
400	1.5	2

300	2	2.7
200	3	4
100	6	8
50	12	16
40	15	20
30	20	26.7
20	30	40
10	60	80

¹Do not exceed the maximum use rate of 6 quarts of GF-1529 (6 lb ae of triclopyr) per acre per year.

²Do not exceed the maximum use rate of 8 quarts of GF-1529 (8 lb ae of triclopyr) per acre per year for non-grazable areas, or 2 quarts (2 lb ae of triclopyr) per acre per year for grazed areas, except on portions of grazed areas that meet the following requirement. Portions of grazed areas that intersect treated non-cropland, rights-of-way and forestry sites may be treated at up to 8 lb ae per acre if the area to be treated on the day of application comprises no more than 10% of the total grazable area.

Apply no more than 2 quarts (2 lb ae) per acre per growing season on rangeland, permanent grass pastures, and conservation reserve program acres, including fence rows and non-irrigation ditch banks within these areas, or any area where grazing or harvesting of hay is allowed unless using basal bark or cut surface treatments.

Low Volume Foliar Treatment

To control susceptible woody plants, mix up to 5% v/v of GF-1529 in water and apply 10 to 100 gallons of finished spray. The spray concentration of GF-1529 and total spray volume per acre should be adjusted according to the size and density of target woody plants and kind of spray equipment used. With low volume sprays, use sufficient spray volume to obtain uniform coverage of target plants including the surfaces of all foliage, stems, and root collars (see Use Precautions and Restrictions). For best results, a surfactant should be added to all spray mixtures. Match equipment and delivery rate of spray nozzles to height and density of woody plants. When treating tall, dense brush, a truck mounted spray gun with spray tips that deliver up to 2 gallons per minute at 40 to 60 psi may be required. Backpack or other types of specialized spray equipment with spray tips that deliver less than 1 gallon of spray per minute may be appropriate for short, low to moderate density brush.

See Table 1 for relationship between mixing rate, spray volume and maximum application rate.

Tank Mixing: As a low volume foliar spray, up to 9 quarts of GF-1529 may be applied in tank mix combination with labeled rates of Tordon 22K or Graslan L in 10 to 100 gallons of finished spray. Graslan L and Tordon 22K are not registered for use in the states of California and Florida.

Broadcast Applications With Ground Equipment

Apply GF-1529 using equipment that will assure thorough and uniform coverage at spray volumes applied. See Table 1 for relationship between mixing rate, spray volume and maximum application rate.

Woody Plant Control

Foliage Treatment: Use 4 to 8 quarts of GF-1529 in enough water to make 5 gallons or more per acre of total spray, or 1 1/2 to 3 quarts of GF-1529 may be combined with labeled rates of Freelexx or a 2,4-D low volatile ester, Graslan L, or Tordon 22K in sufficient water to make 5 gallons or more per acre of total spray. Graslan L and Tordon 22K are not registered for use in the states of California and Florida.

Broadleaf Weed Control

Use GF-1529 at rates of 1 to 4 quarts in a total volume of 5 gallons or more per acre as a water spray mixture. Apply anytime weeds are actively growing. GF-1529 at 0.25 to 3 quarts may be tank mixed with labeled rates of Freelexx or a 2,4-D amine or low volatile ester, Tordon 22K, or Graslan L to improve the spectrum of activity. For thickened (high viscosity) spray mixtures, GF-1529 can be mixed with diesel oil or other inverting agent. When using an inverting agent, read and follow the use directions and

precautions on the product label. Graslan L and Tordon 22K are not registered for use in the states of California and Florida.

Aerial Application (Helicopter Only except for CRP, rangeland and pasture applications where fixed wing can be used)

Aerial sprays should be applied using suitable drift control (see Use Precautions and Restrictions).

Foliage Treatment (Utility and Pipeline Rights-of-Way)

Use 4 to 8 quarts of GF-1529 alone, or 3 to 4 quarts of GF-1529 in a tank mix combination with labeled rates of Frelexx or a 2,4-D low volatile ester, Graslan L or Tordon 22K and apply in a total spray volume of 10 to 30 gallons per acre. Use the higher rates and volumes when plants are dense or under drought conditions. Graslan L and Tordon 22K are not registered for use in the states of California and Florida.

Portions of grazed areas that intersect treated non-cropland, rights-of-way and forestry sites may be treated at up to 8 lb ae per acre if the area to be treated on the day of application comprises no more than 10% of the total grazable area.

Basal Bark, Dormant Stem and Cut Surface Treatments for use on all sites

Individual plant treatments such as basal bark and cut surface applications may be used on any use site listed on this label at a maximum use rate of 8 quarts of GF-1529 (8 lb ae of triclopyr) per acre. These types of applications are made directly to ungrazed parts of plants and, therefore, are not restricted by the grazing maximum rate of 2 quarts of GF-1529 (2 lb ae of triclopyr) per acre.

Conventional Basal Bark Treatment

To control susceptible woody plants with stems less than 6 inches in basal diameter, mix 1 to 5 gallons of GF-1529 in enough oil to make 100 gallons of spray mixture. Apply with backpack sprayer or power spraying equipment using low pressure (20 to 40 psi). Spray the basal parts of brush and tree trunks to a height of 12 to 15 inches from the ground, thoroughly wetting the indicated area. Spray until runoff at the ground line is noticeable. Old or rough bark requires more spray than smooth young bark. Apply anytime, including the winter months, except when snow or water prevent spraying to the ground line. **Mixing with oil requires vigorous agitation to form an oil solution.** Once a solution is formed it will stay stable.

Low Volume Basal Bark Treatment

To control susceptible woody plants with stems less than 6 inches in basal diameter, mix 20 to 30 gallons of GF-1529 in enough oil to make 100 gallons of spray mixture. Apply with a backpack or sprayer using low pressure and a solid cone or flat fan nozzle. Spray the basal parts of brush and tree trunks to a height of 12 to 15 inches from the ground in a manner that thoroughly wets the lower stems, including the root collar area, but not to the point of runoff. Herbicide concentration should vary with size and susceptibility of species treated. Treatments may be applied throughout the year including when snow is present. Efficacy may be reduced when stem surfaces are saturated with water. See Table 1 for relationship between mixing rate, spray volume and maximum application rate. **Mixing with oil requires vigorous agitation to form an oil solution.** Once a solution is formed it will stay stable.

GF-1529 Plus Milestone for basal bark applications

Mix GF-1529 with Milestone in a commercially available basal diluent (or other oils or basal diluents as recommended by the manufacturer); the basal oil should be compatible with a water soluble herbicide such as Milestone. Make a stable tank mixture for basal bark application by first combining each product with a compatibility agent prior to final mixing in the desired ratio. If using a tank mix, mix the oil-based products such as GF-1529 thoroughly with basal oil and add any other oil-based products before adding the water based products. If the mixture stands for more than 30 minutes, reagitation may be required. Oil and water based mixtures can separate over time. Long-term storage is not recommended without vigorous agitation prior to use or without a recommended compatibility agent.

GF-1529 Plus Tordon 22K in Oil Tank Mix: GF-1529 and Tordon 22K may be used in tank mix combination as a low volume basal bark treatment to improve control of certain woody species such as ash, elm, maple, poplar, aspen, hackberry, oak, oceanspray, birch, hickory, pine, tanoak, cherry, locust, sassafras, and multiflora rose. (See product bulletin for mixing instructions.) Tordon 22K is not registered for use in the states of California and Florida.

Streamline Basal Bark Treatment (Southern States)

To control or suppress susceptible woody plants for conifer release, mix 20 to 30 gallons of GF-1529 in enough oil to make 100 gallons of spray mixture. Streamline basal bark treatments are most effective on stems less than 4 inches in basal diameter. Apply with a backpack sprayer or using equipment that provides a directed straight stream spray. Apply the spray in a 2- to 3-inch wide band to one side of stems less than 3 inches in basal diameter. When the optimum amount of spray mixture is applied, the treated zone should widen to encircle the stem within approximately 30 minutes. Treat both sides of stems which are 3 to 4 inches in basal diameter. Direct the spray at bark that is approximately 12 to 24 inches above ground. Pines (loblolly, slash, shortleaf, and Virginia) up to 2 inches in diameter breast height (dbh) can be controlled by directing the spray at a point approximately 4 feet above ground. Vary spray mixture concentration with size and susceptibility of the species being treated. Better control is achieved when spray is applied to thin juvenile bark and above rough thickened mature bark. This technique is not recommended for scrub and live oak species, including blackjack, turkey, post, live, bluejack and laurel oaks, or bigleaf maple. Apply anytime, including winter months, except when snow or water prevents spraying at the desired height above ground level. **Note:** Best results with some hardwood species occur when applications are made from approximately 6 weeks prior to leaf expansion in the spring until approximately 2 months after leaf expansion is completed. **Mixing with oil requires vigorous agitation to form an oil solution.** Once a solution is formed it will stay stable.

Low Volume Stem Bark Band Treatment (North Central and Lake States)

The treatment band may be positioned at any height up to the first major branch. For best results apply the band as low as possible. Spray mixture concentration should vary with size and susceptibility of species to be treated. **Mixing with oil requires vigorous agitation to form an oil solution.** Once a solution is formed it will stay stable.

Thinline Basal Bark Treatment

To control susceptible woody plants with stems less than 6 inches in diameter, apply GF-1529, either undiluted or mixed at 50 to 75% v/v with oil, in a thin stream to all sides of the lower stems. The stream should be directed horizontally to apply a narrow band of GF-1529 around each stem or clump. Use a minimum of 2 to 15 milliliters of GF-1529 or oil mixture with GF-1529 to treat single stems and from 25 to 100 milliliters to treat clumps of stems. Use an applicator metered or calibrated to deliver the small amounts required. **Mixing with oil requires vigorous agitation to form an oil solution.** Once a solution is formed it will stay stable.

Dormant Stem Treatment

Dormant stem treatments will control susceptible woody plants and vines with stems less than 2 inches in diameter. Plants with stems greater than 2 inches in diameter may not be controlled and resprouting may occur. This treatment method is best suited for sites with dense, small diameter brush. Dormant stem treatments of GF-1529 can also be used as a chemical side-trim for controlling lateral branches of larger trees that encroach onto roadside, utility, or other rights-of-way.

High volume and low volume applications using backpacks deliver approximately the same amount of herbicide per acre but differ in delivery volumes to achieve that rate.

High Volume Applications

Mix 4 to 8 quarts of GF-1529 in 2 to 3 gallons of crop oil concentrate or other recommended oil and add this mixture to enough water to make 100 gallons of spray solution. Use continuous adequate agitation. Apply using low pressure (20 to 40 psi). In western states, apply anytime after woody plants are dormant and most of the foliage has dropped. In other areas apply anytime within 10 weeks of budbreak, generally February through April. GF-1529 may be mixed with 4 quarts of Weedone 170 herbicide to improve the

control of black cherry and broaden the spectrum of herbicidal activity. Do not apply to wet or saturated bark as poor control may result.

Low Volume Applications

Mix GF-1529 at 4 to 6 gallons and 2 to 3 gallons of crop oil concentrate or other recommended oil and add this mixture to enough water to make 100 gallons of spray solution. Use continuous adequate agitation. Apply with backpack or other low volume spraying equipment, using low pressure (20 to 40 psi). GF-1529 may be mixed with other herbicides to broaden the spectrum of herbicidal activity. Do not apply to wet or saturated bark as poor control may result.

Cut Surface

Cut surface applications with GF-1529 can be made anytime after cutting up to re-sprouting. After re-sprouting basal bark or foliar applications are more suitable.

Basal Cut Stump Treatment

To control resprouting, mix 20 to 30 gallons of GF-1529 in enough oil to make 100 gallons of spray mixture. Apply with a backpack or sprayer using low pressures and a solid cone or flat fan nozzle. Spray the root collar area and any exposed roots of root suckering species, sides of the stump, and the outer portion of the cut surface, including the cambium, until thoroughly wet, but not to the point of runoff. Spray mixture concentration should vary with size and susceptibility of species treated, using the higher rate for larger stumps, stumps with thicker bark or harder to control plants. Apply anytime, including in winter months, except when snow or water prevent spraying to the ground line. **Mixing with oil requires vigorous agitation to form an oil solution.** Once a solution is formed it will stay stable.

Cut Stump Treatment

To control resprouting of difficult to control species like saltcedar and other *Tamarix* species, bigleaf maple, tanoak, Oregon myrtle, and other susceptible species, apply GF-1529 as a 50% dilution v/v in water by spraying all the exposed cambium layer on the freshly cut surface, or use undiluted GF-1529 immediately after cutting. Use of undiluted GF-1529 is most effective for hard-to-control species. Treatments may be applied throughout the year; however, control may be reduced with treatment during periods of moisture stress as in late summer or early spring sap flow. Cut stumps so that they are approximately level to facilitate uniform coverage of GF-1529. Use an applicator that can be calibrated to deliver the small amounts of material required.

Forest Management Applications

All application methods described on this label may be used on forest management sites.

For broadcast applications, apply 1 to 6 quarts of GF-1529 per acre in a total spray volume of 5 to 25 gallons per acre by air or 10 to 100 gallons per acre by ground. Use spray volumes sufficient to provide thorough coverage of treated foliage. Nozzles or additives that produce larger droplets of spray may require higher spray volumes to provide adequate coverage.

Plant Back Interval for Conifers: Conifers planted sooner than one month after treatment with GF-1529 at less than 4 quarts per acre or sooner than two months after treatment at 4 to 6 quarts per acre may be injured. When tank mixtures of herbicides are used for forest site preparation, labels for all products in the mixture should be consulted and the longest recommended waiting period observed.

Forest Site Preparation (Not For Conifer Release)

Southern States Including Alabama, Arkansas, Delaware, Florida, Georgia, Louisiana, Maryland, Mississippi, North Carolina, Oklahoma, South Carolina, Tennessee, Texas, and Virginia: To control susceptible woody plants and broadleaf weeds, apply GF-1529 at a rate of 4 to 6 quarts per acre. To broaden the spectrum of woody plants and broadleaf weeds controlled, apply 2 to 4 quarts of GF-1529 per acre in tank mix combination with labeled rates of Graslan L or Tordon 22K. Graslan L and Tordon 22K are not registered for use in the state of Florida. Where grass control is also desired, GF-1529, alone or in combination with Tordon 22K or Graslan L, may be applied with labeled rates of other herbicides

registered for grass control in forests. Use of tank mix products must be in accordance with the most restrictive of label limitations and precautions. Do not exceed labeled application rates. GF-1529 cannot be tank mixed with any product containing a label prohibition against such mixing.

In Western, Northeastern, North Central, and Lake States (States Not Listed Above as Southern States): To control susceptible woody plants and broadleaf weeds, apply GF-1529 at a rate of 3 to 6 quarts per acre. To broaden the spectrum of woody plants and broadleaf weeds controlled, apply 1.5 to 3 quarts per acre of GF-1529 in tank mix combination with labeled rates of Graslan L, Tordon 22K, or Freelexx or a 2,4-D low volatile ester or Freelexx. Graslan L and Tordon 22K are not registered for use in the state of California. Where grass control is also desired, GF-1529, alone or in tank mix combination with Graslan L or Tordon 22K, may be applied with labeled rates of other herbicides registered for grass control in forests. When applying tank mixes, follow applicable use directions and precautions on each product label.

Southern Coastal Flatwoods: To control susceptible broadleaf weeds and woody species such as gallberry and wax-myrtle, and for partial control of saw-palmetto, apply 2 to 4 quarts of GF-1529 per acre. To broaden the spectrum of species controlled to include fetterbush, staggerbush, titi, and grasses, apply 2 to 3 quarts per acre of GF-1529 in tank mix combination with labeled rates of Arsenal Applicator's Concentrate herbicide. Where control of gallberry, wax-myrtle, broadleaf weeds, and grasses is desired, apply 2 to 3 quarts of GF-1529 per acre in tank mix combination with labeled rates of Accord Concentrate or Accord SP herbicide.

These treatments may be broadcast during site preparation of flat planted or bedded sites or, on bedded sites, applied in bands over the top of beds. For best results, apply in late summer or fall. Efficacy may not be satisfactory when applications are made in early season prior to August. **Note:** Do not apply after planting pines.

Directed Sprays Applications for Conifer Release

To release conifers from competing hardwoods and brush such as red maple, sugar maple, striped maple, sweetgum, red and white oaks, ash, hickory, alder, birch, aspen, pin cherry, *Ceanothus* spp., blackberry, chinquapin, and poison oak, mix 4 to 20 quarts of GF-1529 in enough water to make 100 gallons of spray mixture. This spray mixture should be directed onto foliage of competitive hardwoods using backpack sprayers with flat fan nozzles or equivalent anytime after the hardwoods and brush have reached full leaf size, but before autumn coloration. The majority of treated hardwoods and brush should be less than 6 feet in height to ensure adequate spray coverage. Care should be taken to direct spray solutions away from contact with conifer foliage, particularly foliage of desirable pines. See Table 1 for relationship between mixing rate, spray volume and maximum application rate.

Note: Spray may cause temporary damage and growth suppression where contact with conifers occurs; however, injured conifers should recover and grow normally. Over-the-top spray applications can kill pines.

Broadcast Applications for Mid-Rotation Understory Brush Control in Southern Coastal Flatwoods Pine Stands (Ground Equipment Only)

For control of susceptible species, such as gallberry and wax-myrtle, and broadleaf weeds, apply 2 to 4 quarts of GF-1529 per acre. To broaden the spectrum of woody plants controlled to include fetterbush, staggerbush, and titi, apply 2 to 3 quarts of GF-1529 per acre in tank mix combination with labeled rates of Arsenal Applicator's Concentrate. Saw-palmetto will be partially controlled by use of GF-1529 at 4 quarts per acre or by mixtures of GF-1529 at 2 to 3 quarts per acre in tank mix combination with either Arsenal Applicator's Concentrate or Escort herbicide. These mixtures should be broadcast applied over target understory brush species, **but to prevent injury to pines, make applications underneath the foliage of pines.** Apply sprays in 30 gallons or more per acre of total volume. For best results, apply in late summer or fall. Efficacy may not be satisfactory when applications are made in early season prior to August.

Broadcast Applications for Conifer Release in the Pacific Northwest and California

Dormant Conifers Before Bud Swell (Excluding Pines): To control or suppress deciduous hardwoods such as vine maple, bigleaf maple, alder, scotch broom, or willow **before leaf-out**, or evergreen hardwoods such as madrone, chinquapin, and *Ceanothus* spp., use GF-1529 at 1 to 2 quarts per acre. Use diesel or fuel oil as a diluent, or use water plus 1 to 2 gallons per acre of diesel oil or a suitable surfactant or oil substitute at manufacturer's recommended rates. **Mixing with oil as the only diluent requires vigorous agitation to form an oil solution.** Once a solution is formed it will stay stable.

Conifer Plantations (Excluding Pines) After Hardwoods Begin Growth and Before Conifer Bud Break ("Early Foliar" Hardwood Stage): Use GF-1529 at 1 to 1.5 quarts alone or with Freelexx or 2,4-D low volatile ester herbicide in water carrier to provide no more than 3 lb ae per acre from both products. After conifer bud break, these sprays may cause more serious injury to the crop trees. Use of a surfactant may cause unacceptable injury to conifers especially after bud break.

Conifer Plantations (Excluding Pines) After Conifers Harden Off In Late Summer and While Hardwoods Are Still Growing Actively: Use GF-1529 at rates of 1 to 1.5 quarts per acre alone or with Freelexx or a 2,4-D low volatile ester. Treat as soon after conifer bud hardening as possible so that hardwoods and brush are actively growing. Use of oil, oil substitute, or surfactant may cause unacceptable injury to the conifers.

Broadcast Applications for Conifer Release in the Eastern United States

To release spruce, fir, red pine, and white pine from competing hardwoods such as red maple, sugar maple, striped maple, alder, birch (white, yellow, and grey), aspen, ash, pin cherry, and *Rubus* spp. and perennial and annual broadleaf weeds, use GF-1529 at rates of 1.5 to 3 quarts per acre alone or with Freelexx or a 2,4-D amine or low volatile ester. Apply in late summer or early fall after conifers have formed their overwintering buds and hardwoods are in full leaf and prior to autumn coloration.

Broadcast Applications for Conifer Release in the Lake States Region

To release spruce, fir, and red pine from competing hardwoods such as aspen, birch, maple, cherry, willow, oak, hazel, and *Rubus* spp. and perennial and annual broadleaf weeds, use GF-1529 at rates of 1.5 to 3 quarts per acre. Apply in late summer or early fall after conifers have formed their overwintering buds and hardwoods are in full leaf and prior to autumn coloration.

Rangeland and Permanent Grass Pastures

All application methods described on this label may be used on rangeland and pasture sites.

Mesquite Control Using High Volume Foliage Treatment: For control of mesquite infestations of low to moderate density, apply GF-1529 specialty herbicide and Sendero in a tank mixture to individual plants with backpack or hand-held sprayers or a vehicle-mounted sprayer with hand-held spray wand or spray gun. For individual plant treatment, use 2 quarts of GF-1529 per 100 gallons of total spray solution in combination with Sendero. Apply in water or as an oil-water emulsion as described in Mixing Directions. If using an oil-water emulsion, add the oil at a rate of 5% of the total spray volume. Apply as a complete spray-to-wet foliar application, including all leaves. Thorough coverage is necessary for good results, but do not spray to the point of runoff. Do not apply when mesquite foliage is wet. For best results, follow information given elsewhere in this label concerning effect of environmental conditions and application timing on control. This application method works best for brush less than 8 feet tall since efficient treatment and thorough coverage of taller brush is difficult to achieve with this method. To minimize drift, select a spray nozzle and pressure that provides good coverage while forming a coarse spray. Additionally, drift may be reduced by using the minimum pressure necessary to obtain plant coverage without forming a mist and by directing sprays no higher than the top of target plants. If desired, a spray dye may be added to the spray mixture to mark the treated plants.

Broadcast Application With Aerial or Ground Equipment

Environmental conditions and application timing influence brush and weed control results. For best results, apply when woody plants and weeds are actively growing. For woody species, apply after the rapid growth period of early spring when leaf tissue is fully expanded and terminal growth has slowed. Brush regrowth should be at least 4 ft high prior to treatment to insure adequate foliage for herbicide

absorption. Adequate soil moisture before and after treatment as well as the presence of healthy foliage at the time of application are important factors contributing to optimal herbicidal activity.

Use sufficient spray volume to completely and uniformly cover foliage. For ground application, apply 10 gallons or more of total spray volume per acre. For aerial application, apply at least 2 gallons of total spray volume per acre. Use higher spray volumes for ground or aerial applications to ensure adequate coverage with increased depth and density of foliage, particularly for treatment of woody plants.

Mesquite: The herbicidal response of mesquite is strongly influenced by foliage condition, growth stage and environmental conditions. For best results, apply when new growth foliage has turned from light to dark green, when the soil temperature is above 75°F at a depth of 12 to 18 inches, and soil moisture is adequate for plant growth. Apply within 60 days after the 75°F minimum soil temperature at the 12- to 18-inch depth has been reached. Product performance may be adversely affected if application is made before mesquite foliage has turned from light to dark green or if foliage has been injured or removed by late frost, insects, hail or plant diseases. Do not treat if mesquite exhibits new (light green) terminal growth in response to recent heavy rainfall during the growing season. Rate of soil warm-up at the 12- to 18-inch depth may vary with soil texture and drainage. Coarse-textured (sandy) soils warm up sooner than fine-textured (clay) soils and dry soils warm up more quickly than wet soils. Mesquite regrowth should be at least 4 ft high prior to treatment to insure adequate foliage for herbicide absorption.

Mesquite Only

Apply 1/2 to 1 pint of GF-1529 per acre in combination with Sendero. See the Sendero label for additional treatment recommendations and information on mesquite control. Apply aerially as an oil:water emulsion in 4 gallons or more total volume per acre or with ground equipment in 10 gallons or more total volume per acre. Use a maximum of 1 gallon of oil per acre for aerial or ground application.

Sand Shinnery Oak Suppression

In Texas, New Mexico and Oklahoma, apply GF-1529 alone at a rate of 1/2 to 2 pints per acre for suppression of shinnery oak growing on sandy soils. Grass response following suppression may be impressive where rainfall is adequate. Grazing deferment following application together with proper grazing management is recommended to allow for the reestablishment of grass stands.

Post Oak and Blackjack Oak Suppression - Regrowth Stands

Apply in the late spring (May) to early summer (June-July) when oak leaves are fully developed (expanded). Use 2 quarts of GF-1529 alone or in tank mix combination with Freelexx or a 2,4-D low-volatile ester herbicide per acre. Apply in an oil:water emulsion or water surfactant dilution in sufficient total volume per acre to assure thorough coverage, usually 5 gallons or more per acre by fixed-wing aircraft or helicopter or 15 to 25 gallons per acre by ground equipment. Use a maximum of 1 gallon of oil per acre for aerial or ground application. Lower rates may be used for suppression only. Control will require at least 3 consecutive treatments. **Note:** Regrowth plants have a large root mass relative to top growth when compared to undisturbed plants. In order for top growth to intercept and translocate enough herbicide to control the roots, delay broadcast treatment until top growth is at least 4 ft tall.

High Volume Foliage Treatment: For regrowth less than 4 ft tall, apply 2 quarts of GF-1529 per 100 gallons of water and 2 quarts of ag surfactant alone or in tank mix combination with GrazonNext HL or Tordon 22K. Apply as a high volume leaf-stem treatment to individual plants using ground equipment.

Post Oak and Blackjack Oak - Mature Stands

For control of mature stands (greater than 5 ft tall), apply 2 quarts of GF-1529 per acre in late spring (May) to early summer (June-July) when oak leaves are fully developed (expanded). Understory species such as winged elm, buckbrush, tree huckleberry and ash occurring in some areas will not be controlled (only suppressed or defoliated) by using GF-1529 alone. Where these understory species occur, control may be improved by tank mixing 2 quarts of GF-1529 with Tordon 22K or GrazonNext HL per acre. For best results, apply as an oil:water emulsion in a total volume of 5 gallons per acre or more by fixed-wing aircraft or helicopter.

Other Susceptible Woody Plants

Apply 2 to 4 pints of GF-1529 alone or in combination with Freelexx or a 2,4-D low volatile ester or amine formulation per acre. If difficult to control species such as ash, choke cherry, elm, maple or oaks are prevalent, and during applications made when plants are mature late in the summer or during drought conditions, use the higher rates of GF-1529, alone or with Freelexx or 2,4-D. GF-1529 may also be applied in a tank mixture with GrazonNext HL or Tordon 22K for increased control of certain species. See labels for GrazonNext HL and Tordon 22K for additional information and treatment recommendations. Apply aerially in 4 gallons or more total volume per acre or with ground equipment in 10 gallons or more total volume per acre. For best results on blackberry, apply during or after bloom. For management of kudzu, apply 1 quart of GF-1529 per acre. Repeat application may be necessary to achieve desired level of control.

Susceptible Broadleaf Weeds

Use 2 pints of GF-1529 per acre in a water spray. Apply as a broadcast spray in a total volume of 10 gallons or more per acre by ground equipment or aerially in a total volume of 2 gallons or more per acre. Apply anytime the weeds are actively growing. GF-1529 at 1/2 to 3 pints may be tank mixed with Freelexx or a 2,4-D amine or low volatile ester.

Basal Bark and Dormant Stem Treatments

Individual plant treatments such as basal bark and cut surface applications may be used on any use site listed on this label at a maximum use rate of 8 lb ae of triclopyr per acre. These types of applications are made directly to ungrazed parts of plants and, therefore, are not restricted by the grazing maximum rate of 2 lb ae of triclopyr per acre. See above in the section **Basal Bark, Dormant Stem and Cut Surface Treatments for use on all site** for more use information.

Low Volume Basal Bark Treatment

To control susceptible woody plants such as mesquite, huisache, red maple, red and white oak, birches and aspen with stems less than 6 inches in basal diameter.

Streamline Basal Bark Treatment

To control or suppress susceptible woody plants such as mesquite, huisache, red maple, white and red oak, elbowbush, greenbriar, hackberry, pricklyash, yaupon and wild grape

Cut Stump, Basal Cut Stump, Dormant Stem, Thinline Basal Bark Treatments

To control resprouting, apply undiluted GF-1529 to wet the cambium and adjacent wood around the entire circumference of cut stumps. Treatments may be applied throughout the year; however, control may be reduced with treatment during periods of moisture stress as in late summer. Cut stumps so that they are approximately level to facilitate uniform coverage of GF-1529. Use an applicator which can be calibrated to deliver the small amounts of material required.

Growing Point and Leaf Base (Crown) Treatment of Yucca

Prepare a 2% v/v solution of GF-1529 in basal oil, diesel or fuel oil (13 fl oz of GF-1529 in 5 gallons of spray mixture). Thoroughly wet the center of the plant including growing point and leaf bases to the soil surface. Complete coverage of leaves is not necessary.

Conservation Reserve Program (CRP) for Established Permanent Grass Stands

Use GF-1529 specialty herbicide on CRP acres only after perennial grasses are well established.

Broadcast Application Ground or Aerial: Apply 1 to 2 pints of GF-1529 per acre for small weed control or up to 1 1/2 quarts of GF-1529 per acre for deep-rooted perennial and susceptible woody species control. Use enough water to deliver 10 gallons or more per acre by ground or 2 gallons or more per acre by air of total spray volume.

Restrictions:

- On CRP acres, apply no more than 2 quarts of GF-1529 per acre per growing season.

- When applying to CRP lands, follow all applicable state and federal regulations. Follow the most severe grazing restriction imposed by the pesticide label or by the USDA Acreage Conservation Reserve Program. After that time period, follow local (CRP) guidelines regarding cropping and haying restrictions. Do not use GF-1529 if legumes are a desired cover crop during CRP.

Terms and Conditions of Use

If terms of the following Warranty Disclaimer, Inherent Risks of Use, and Limitation of Remedies are not acceptable, return unopened package at once to the seller for a full refund of purchase price paid. To the extent permitted by law, otherwise, use by the buyer or any other user constitutes acceptance of the terms under Warranty Disclaimer, Inherent Risks of Use and Limitation of Remedies.

Warranty Disclaimer

Dow AgroSciences warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions, subject to the inherent risks set forth below. To the extent permitted by law, Dow AgroSciences MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.

Inherent Risks of Use

It is impossible to eliminate all risks associated with use of this product. Plant injury, lack of performance, or other unintended consequences may result because of such factors as use of the product contrary to label instructions (including conditions noted on the label, such as unfavorable temperature, soil conditions, etc.), abnormal conditions (such as excessive rainfall, drought, tornadoes, hurricanes), presence of other materials, the manner of application, or other factors, all of which are beyond the control of Dow AgroSciences or the seller. To the extent permitted by law, all such risks shall be assumed by buyer.

Limitation of Remedies

To the extent permitted by law, the exclusive remedy for losses or damages resulting from this product (including claims based on contract, negligence, strict liability, or other legal theories), shall be limited to, at Dow AgroSciences' election, one of the following:

1. Refund of purchase price paid by buyer or user for product bought, or
2. Replacement of amount of product used.

To the extent permitted by law, Dow AgroSciences shall not be liable for losses or damages resulting from handling or use of this product unless Dow AgroSciences is promptly notified of such loss or damage in writing. To the extent permitted by law, in no case shall Dow AgroSciences be liable for consequential or incidental damages or losses.

The terms of the Warranty Disclaimer, Inherent Risks of Use and this Limitation of Remedies cannot be varied by any written or verbal statements or agreements. No employee or sales agent of Dow AgroSciences or the seller is authorized to vary or exceed the terms of the Warranty Disclaimer or this Limitation of Remedies in any manner.

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Supplemental Labeling



Dow AgroSciences

GF-1529

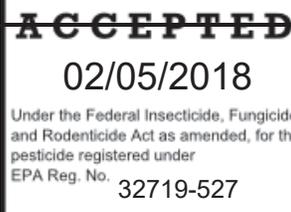
EPA Reg. No. 62719-527

Directions for Use on Land Grazed by Lactating Dairy Animals

This supplemental label expires on January 31, 2021 and must not be used or distributed after this date.

ATTENTION

- It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
- This labeling must be in the possession of the user at the time of application.
- Read the label affixed to the container for GF-1529 herbicide before applying. Carefully follow all precautionary statements and applicable use directions.
- Use of GF-1529 according to this supplemental labeling is subject to all use precautions and limitations imposed by the label affixed to the container for GF-1529.



CAUTION

Use Precautions and Restrictions

Consult with a Dow AgroSciences representative if you do not understand the "Use Precautions and Restrictions." Call (1-800-263-1196) for more information.

Grazing and Haying Restrictions

Grazing

- There are no grazing restrictions for livestock or dairy animals on treated areas
- Portions of grazed areas that intersect treated non-cropland and rights-of-way sites may be treated at up to 8 lb ae per acre if the area to be treated on the day of application comprises no more than 10% of the total grazable area.

Haying (harvesting of dried forage)

- Do not harvest hay for 14 days after application.

Slaughter Restriction: During the season of application, withdraw livestock from grazing treated grass at least 3 days before slaughter.

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Replaces: Initial